

Objections Due: June 20, 2011 at 4:00 p.m. (Eastern)
Hearing Date and Time: June 30, 2011 at 10:00 a.m. (Eastern)

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As Trustee of Structured Asset Investment Loan Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	
)	Chapter 11
LEHMAN BROTHERS HOLDINGS, INC., <u>et al.</u> ,)	
)	Case No. 08-13555 (JMP)
Debtors.)	
)	Jointly Administered
)	

**RESPONSE OF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE,
TO THE DEBTOR'S 97th OMNIBUS OBJECTION TO CLAIMS**

Deutsche Bank National Trust Company (the "Trustee"), as Trustee of the Structured Asset Investment Loan Trust (the "Trust") hereby responds to the *Debtors' Ninety-Seventh Omnibus Objection to Claims (Insufficient Documentation)* (the "Objection") [Dkt. No. 14492] and joins in the arguments set forth in the *Response of U.S. Bank National Association, as Trustee, ("U.S. Bank") to the Debtors' Omnibus Objections to Residential Mortgage*

Securitization Claims (Included In, But Not Limited to the 98th, 99th and 101st Omnibus Objections) (the “Response”) [Dkt No. 16891].¹

RESPONSE AND JOINDER

1. The Trustee, like U.S. Bank, objects to the Debtors’ allegation that it failed to provide sufficient supporting documentation for the claim filed by the Trustee on behalf of the Trust (the “Claim”)[Proof of Claim No. 18542]. Accordingly, the Trustee joins in the arguments set forth in U.S. Bank’s Response, as if fully set forth herein, to the extent the Response addresses the Debtor’s allegations that the Claim included insufficient documentation. Specifically, the Trustee asserts that the Claim, as originally filed, contained sufficient information to meet its obligations under the Bankruptcy Code and under applicable case law to establish a *prima facie* claim. Notably, the Debtors’ Objection does not attack the merits of the underlying Claim, but rather seeks to attack only procedural aspects of the Claim.

2. Since filing of the Objection, the Trustee has asked the Debtors what further information would be needed to establish the merits of the Claim and the Trustee has also expressed a willingness to share further information when, and if any, additional defaults arise. The Trustee has made every effort to comply with the Debtors’ procedural objections by providing the Debtors with all applicable transaction documents, detailed loan-level data, and information outlining all known claims. Accordingly, it is not clear what documentation would constitute “sufficient documentation” in the Debtors’ opinion.

3. Moreover, with regard to the only known existing loan default in the Trust, Aurora Loan Services Inc. (“Aurora”) acts as the Master Servicer for that loan. Aurora also happens to be a non-debtor affiliate of the Debtors. Any additional information sought by the

¹ Capitalized terms used but not defined herein shall have the meanings given to such terms in the Objection or Response, as applicable.

Debtors must be provided by Aurora. For the foregoing reasons, the Objection cannot be sustained.

CONCLUSION

WHEREFORE, the Trustee requests that this Court: (i) overrule the Objection as it relates to the Claim; (ii) deny the Debtors' demands for further documentation; and (iii) grant such further relief to the Trustee as is appropriate.

Dated: New York, New York
June 20, 2011

Respectfully Submitted,

By: /s/ Christopher M. Desiderio
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